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Hon. Victoria Reznik
United States Courthouse
300 Quarropas Street
White Plains, New York 10601

re: United States v. Nileshkumar Patel, 23-mj-6797

Dear Judge Reznik:

This letter is an application to modify the bail conditions for Nileshkumar Patel to permit him to attend a religious celebration this weekend. Mr. Patel's bail conditions include a curfew fixed by pretrial services and enforced by GPS monitoring. The pretrial services office currently has in place a curfew from 8 p.m. to 8 a.m. and has advised Mr. Patel that he needs Court permission for this modification.

The religious event traditionally takes place late at night from approximately 10 p.m. to 3 a.m. This outdoor event is centered around India Square on Newark Avenue in Jersey City, New Jersey, which is a short walk from Mr. Patel's residence. Celebrations are scheduled for Friday, October 27, 2023, and Saturday, October 28, 2023. Mr. Patel requests that his curfew be modified by extending his hours to 3 a.m. on those two nights. Alternatively, if only one date is permitted by the Court, he requests permission to go October 28.

I have conferred with government counsel AUSA Timothy Ly who advised yesterday that the government wanted to consult with the pretrial services office before responding and that they would try to have a response this afternoon. I do not currently know the government's position.

Very truly yours,

/s/ Theodore S. Green
Theodore S. Green
Attorney for Nileshkumar Patel